

IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION
JANUARY 2011 SESSION

CLERK'S OFFICE U.S. DIST. COURT
AT ROANOKE, VA
FILED

JAN 20 2011

JULIA C. DUDLEY, CLERK
BY: *Amoodley*
DEPUTY CLERK

UNITED STATES OF AMERICA

v.

CRYSTAL ANNE FROST
SPENCER CRUISE MUMPOWER

Criminal No. 7:11 CR 2

**SEALED
INDICTMENT**

In Violation of:
Title 21, U.S.C., § 846
Title 21, U.S.C., § 841(a)(1)

COUNT ONE

The Grand Jury charges:

1. That from a time unknown to the Grand Jury, and continuing through April 8, 2010, in the Western Judicial District of Virginia, the defendants, CRYSTAL ANNE FROST and SPENCER CRUISE MUMPOWER, willfully and knowingly combined, conspired, confederated and agreed with diverse other persons known and unknown to the Grand Jury, to commit the following offenses against the United States, to wit: to possess with intent to distribute and to distribute a mixture or substance containing heroin, a Schedule I controlled substance, resulting in death, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

*and serious bodily
injury*

2. All in violation of Title 21, United States Code, Section 846.

Scott B. Gorman 1-20-11

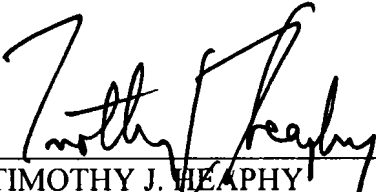
COUNT TWO

The Grand Jury charges:

1. That on or about the April 8, 2010, in the Western Judicial District of Virginia, the defendants, CRYSTAL ANNE FROST and SPENCER CRUISE MUMPOWER, did knowingly and intentionally distribute a mixture or substance containing heroin, a Schedule I narcotic controlled substance, resulting in death, and did aid and abet in the same.

and serious bodily injury Scott B. Donelson 1-20-11
2. In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

A TRUE BILL this 20th day of January, 2011.


TIMOTHY J. HEAPHY
UNITED STATES ATTORNEY


FOREPERSON